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UBER TECHNOLOGIES, INC.;  
RASIER, LLC; and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

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This Document Relates to:

*Jaylynn Dean v. Uber Technologies, Inc., et al.,*  
*No. 3:23-cv-06708*

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF UBER'S  
ADMINISTRATIVE MOTION TO SEAL  
PERSONALLY IDENTIFYING  
INFORMATION**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am a partner at Kirkland & Ellis LLP, counsel of record for Defendants Uber  
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in  
4 the above-captioned matter in support of Uber’s Administrative Motion (“Motion”) to Seal Personally  
5 Identifying Information (“PII”) Contained in Defendants’ Declaration of Andrew Hasbun.

6 2. Plaintiffs do not oppose the sealing of the PII (Mr. Hasbun’s home address).

7 3. Attached as Exhibit 1 is the Declaration of Andrew Hasbun with the proposed redaction.

8 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
9 is true and correct.

10 Dated: December 29, 2025

Respectfully submitted,

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12 By: /s/ Laura Vartain Horn  
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22 LLC; and RASIER-CA, LLC  
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